

SHER TREMONTE LLP

October 28, 2024

BY ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Yoel Abraham et al.*, 20-CR-411 (RA)

Dear Judge Abrams:

We represent Yoel Abraham. We write to respectfully request that the Court exonerate Mr. Abraham's bond, order the release of the property posted to secure that bond, and direct that Pretrial Services return Mr. Abraham's travel documents to him or to our office.

Mr. Abraham was arrested on or about August 19, 2020 and released on a \$2,000,000 personal recognizance bond, secured by \$30,000 cash and Mr. Abraham's personal residence. ECF No. 35. On September 5, 2024, Your Honor sentenced Mr. Abraham to be imprisoned for a term of 30 months, followed by three years of supervised release. ECF No. 223. Mr. Abraham has advanced his surrender date to this Friday, November 1, 2024. As the case is now resolved, we respectfully request that Your Honor sign the proposed order exonerating Mr. Abraham's bond, ordering that all property posted as security on the bond should be released from liability, and directing Pretrial Services to return Mr. Abraham's travel documents to him or undersigned counsel. We have not been able to reach the government to obtain its position regarding this request.

cc: All counsel of record (by ECF)

Respectfully submitted,

/s/ *Justine Harris*
Justine Harris
Noam Biale

Unless the Government objects beforehand,
Defendant's application shall be granted after
he surrenders on November 1, 2024.

SO ORDERED.



Hon. Ronnie Abrams
October 29, 2024